

Application/Control Number : 09/492,755  
Art Unit: 1722  
August 29, 2003  
Page 16

**Remarks**

Claims 1-12 and 14-16 are pending. Claims 1, 6, 11, 12, and 16 are independent claims. Reconsideration and reexamination of the application is respectfully requested.

While applicant believes that the previously pending claims patentably distinguished the invention over the prior art of record, the present amendment is submitted for facilitating issue of the present application.

Each of the independent claims 1, 6, 11, 12, and 16 has been amended to more clearly define the structure of the radial holes 23 formed radially in the plate and connected to the ports 23a (see page 4, lines 15-21 of applicant's disclosure). This claimed structure advantageously provides for an efficient and effective separation of the cap from the punch, with a temporary "widening" of the cup B of the cap which allows the undercut threads C to separate from the punch (see page 9, lines 5-20 of applicant's disclosure).

Applicant submits that the claimed invention is not rendered obvious to a person having ordinary skill in the art by the prior art of record.

In particular, Beck teaches a single axial hole 32 at the bottom of the pressurized air passageway 35 (Fig. 5), and Alieri teaches only an axial channel 76 and outlet 77 (Fig. 11). Accordingly, it is submitted that any fair combination of Beck and Alieri does not allow to even arrive at applicant's claimed structural combination.

Note further that Beck teaches separation of the smooth surface bottle portion 53 from the mandrel (Fig. 5), while such bottle still needs to "unthreaded" from die portion 40 (column 5, lines 15-18). Accordingly, applicant advantageous efficient and effective separation of the cap from the punch, with a temporary "widening" of the cup B of the cap which allows the undercut threads C to separate from the punch, is deemed by applicant to be surprising and unexpected over the prior art of record.

Application/Control Number : 09/492,755

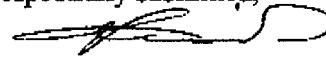
Art Unit: 1722

\*August 29, 2003

Page 17

In view of the foregoing, applicant respectfully solicits allowance of pending claims 1-12 and 14-16.

Respectfully submitted,



Guido MODIANO (Reg. No. 19,928)  
Agent for the Applicant

Date: August 29, 2003

Address: Via Meravigli 16, 20123 MILAN-ITALY

Telephone: (from USA) (011)(39)(02) 65 90 77 77

OFFICIAL

FAX RECEIVED  
AUG 29 2003  
TC 1700